

DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

5000 OVERLOOK AVENUE, S.W. WASHINGTON, D.C. 20032

March 17, 2004

Mr. Donald S. Welsh Regional Administrator United States Environmental Protection Agency Region III 1650 Arch Street Philadelphia PA 19103-2029 VIA FAX 215-814-2301 AND E-Mail

Subject: Additional Report on DCWASA Interim Actions Lead in Drinking Water Issue, Washington, DC

Dear Mr. Welsh:

This letter provides additional information on four topics identified in our March 10, 2004 letter to you concerning interim actions to address the lead in drinking water issue in Washington, DC. As outlined below, it is anticipated that additional information will be developed on these topics as we gather more data and receive more input from the District government.

Distribution Plan for Point of Use Devices

Reporting on this is sue is complicated because of the active role of the District's Emergency Management Agency (DCEMA), and the extremely recent action by the District's Mayor. As you know, DCEMA has thus far taken the lead in distributing over 2000 point of use devices, with extensive support from DCWASA. DCWASA is verifying eligible addresses in its billing database, and is noting within that database the specific customers who receive devices to facilitate future distribution of replacement materials in accordance with manufacturer's instructions. DCEMA has also developed an extensive plan for continued distribution involving multiple points throughout the District. On March 16, the District's Mayor requested that DCWASA utilize mail (or equivalent) methods to distribute the remaining devices to homes believed to be served by lead service lines, and DCWASA is committed to timely implementation of this new program. Given the significant change in direction and short time available, only a preliminary schedule of actions can be provided at this time. Key milestone dates are provided below:

Not later than March 23, 2004

Not later than March 31,2004

Not later than April 10, 2004

Not later than April 10, 2004

Accomplish initial direct distribution

Attempt delivery to each lead service address not already noted to have received a device.

Approximately 10,000 devices have already been obtained by DCWASA, and delivery of an additional quantity of 12,000 devices is anticipated by March 31, 2004. DCWASA is committed to obtaining any additional devices required to meet the schedule outlined above. As an interim measure, distribution at sites identified by DCEMA will continue, allowing those with urgent near-term needs to obtain a device without waiting for delivery.

Public Information Initiatives

An updated and expanded plan is provided in attachments to this letter. The first attachment summarizes scheduled Public Information Activities as required by EPA regulation. Additional attachments summarize the major components of our plan and the extensive number of public meetings already held and planned for the near future.

Service Line Replacement

Attached to this letter is an updated service line replacement plan concurrently submitted to your staff member designated as the primary point of contact. Several additional points merit attention:

- 1. DCWASA management will be presenting for consideration by its Board of Directors at its April 2004 meeting an additional initiative to support lead service line replacement. Under this approach, a direct cost share would be provided to property owners who initiate and manage the full replacement of the lead service line from the main to the first threaded joint of non-lead pipe. Final approval of this proposal (or a modified proposal) by the DCWASA Board of Directors cannot be assured at this time. Should the proposal be approved, this approach will provide another mechanism for replacing lead service lines in the District. This proposal is designed to specifically support the goal of full service line replacement,
- 2. While development of a funding mechanism for loan and/or grant support of private service line replacement costs is, by necessity, a time-consuming process, a recent proposal by a member of the Council of the District of Columbia suggests that a significant amount of District Capital Improvement Funding may be brought to bear on this issue. Additionally, DCWASA will continue to evaluate opportunities for loan and/or grant funding to support private service line replacement costs; however, DCWASA is constrained by prohibitions against loans pursuant to the DC Home Rule Act and other appropriations considerations.
- 3. As outlined in the updated service line replacement plan, input from DCDOH will be sought on prioritization of service line replacements under Contract 2004-2. The exact prioritization methodology is still in development, but it is anticipated that initial priority replacements, expected to begin in approximately June 2004, will focus on properties with documented "service line draw" lead concentrations exceeding 300 ppb, where such properties are occupied by children under the age of 6 and/or pregnant/nursing mothers.
- 4. DCWASA will continue to research available technology that could provide remediation of lead service lines without requiring replacement. DCWASA is aware of U.S. Army demonstration of an approach at Fort Drum, NY, and other locations to chemically coat service lines and internal plumbing to reduce lead leaching, and seeks technical input from USEPA on (1) whether such an approach would satisfy "effective replacement" regulations and (2) whether the specific approach would be permissible under Safe Drinking Water Act requirements.

Additional Sampling

DCWASA's proposed initiatives for additional sampling are outlined in the attached Draft Sampling Plans, which are provided for review by USEPA. DCWASA is prepared to carry out supplemental sampling according to the proposed protocols and schedules upon approval by USEPA.

Sincerely,

Original signed by Jerry N. Johnson

Jerry N. Johnson General Manager

Members, Board of Directors, DCWASA

DC DCWASA 2004 Enhanced Public Information Plan for Lead

Required Public Education in Accordance with 40CFR 141.85

- Attachment #1, from EPA Public Education Guidance, June 2002 lists the mandatory public education activities with which DCWASA will comply.
- During 2004 DCWASA intends to supplement the brochure "Living Lead Free in DC" with a new publication that explains the current lead level situation in DC.
- The Consumer Confidence Report due July 1, 2004 will describe in detail the current lead situation.

Enhanced Public Information Plan

• Community and Civic Meetings

- o Attachment #2 lists 23 meetings that have occurred or are planned for 2004.
 - At several of the meetings, DCWASA Information Technology staff
 was present with computer systems that accessed the DCWASA
 customer information database to inform customers, on the spot, of the
 material of their service line.

• News Conferences/Press Releases

- o DCWASA has held three media briefings thus far in 2004 and will hold additional briefings as warranted by events.
- DCWASA has thus far issued four press releases on the subject of lead and will issue additional releases as warranted by events.

Hotline

DCWASA maintains a Lead Services Hotline, (202) 787-2732 that is open from 7am - 7pm, Monday through Friday, and 9am - 5pm, Saturday and Sunday.
 Callers will obtain immediate answers to most questions. Some questions are referred to technical staff for later follow up.

• E-Mail

DCWASA maintains a Lead Services e-mail question/answer program, <u>WQP2003@DCWASA.com</u> Most questions are responded to expeditiously and when questions are referred to technical staff, these are answered generally within a few days.

• Enhanced Website

- DCWASA has significantly enhanced its website, http://www.DCWASA.comto provide extensive and frequently updated information to customers regarding lead.
- o The site contains such features as:
 - An animated explanation if the problem that customers can readily understand
 - The latest news of events
 - Answers to frequently asked questions
 - Maps of test results, locations of lead services and replacement programs
 - List of replacement program blocks
 - Lists of upcoming public meetings
 - Links to brochures, related websites and other information related to the lead issue.
 - Information on test kit drop off sites
 - Summary of test results
 - Text of news releases and letters to customers
 - An opportunity for e-mail updates, and

• Other information that can be viewed at the site

• Letters to DC Residents and DCWASA Customers

- On February 9, 2004 General Manager Jerry N. Johnson sent a letter to all DCWASA customers explaining the lead situation based on the state of knowledge at that time. The letter included an enclosure: An Information Guide to Lead in Drinking Water. This information is updated on the website and through press conferences and press releases as needed.
- o The DCDOH Interim Chief Medical Officer, in consultation with DCWASA and the Mayor's Task Force, issued a letter to all DC residents regarding the health implications of the lead in drinking water situation. The letter is dated February 26, 2004.
- o DCWASA will issue to District residents a special edition newsletter that covers the lead topic.

• Sampling Program

- DCWASA has conducted a much more extensive sampling program than is required by the regulations.
- o The first sampling program consisted of delivery of test kits via FEDEX and pickup at the door.
- o DCWASA routinely refers all test results over 300 ppb to DCDOH.
- o The revised sampling program features "customer friendly" instructions, including photographs, the convenience of requesting a test kit via phone and delivery and mailing of kits via UPS to the lab, with results mailed back to the customer.
- o With test result letters, DCWASA also now includes a form that solicits information that can be used by DCWASA and DCDOH for prioritizing future replacements.
- o DCWASA has added six customer sample drop off centers at DCWASA and WAD facilities for the convenience of customers.

ATTACHMENT 1

(insert Adobe Acrobat Page here)

DCWASA Community and Civic Lead Meetings

November 12, 2003

Burleith Citizen's Association Washington International School 3100 Macomb Place, NW

December 11, 2003

Monroe Street Association St. Stephen's Church

December 16, 2003

Moms On the Hill 504 8th Street NW

December 17, 2003

EPA Grant Meeting Martin Luther King Branch Library

February 3, 2004

ANC 2E Meeting Georgetown University

February 11, 2004

ANC 2B Jewish Community Center 16th & Q Streets, NW

February 17, 2004

Moms On the Hill St. Peter's Church 3131 2nd St., SE

February 18, 2004

DCWASA Lead Community Meeting Francis Gregory Branch Library 3600 Alabama Avenue, SE

February 19, 2004

Kalorama Citizens Association Goodwill Baptist Church 1862 Kalorama Road, NW

February 20, 2004

Federation Civic Assembly Meeting One Judiciary Square 441 Fourth Street, NW

February 23, 2004

ANC 3C Meeting Second District MPD Station 3320 Idaho Avenue, NW

February 26, 2004

DCWASA Lead Community Meeting Washington Highland Branch Library 115 Atlantic Street, SW

March 2, 2004

DCWASA Lead Community Meeting Palisades Branch Library 4901 V Street, NW

March 5, 2004

Bloomingdale Neighborhood Association 1908 North Capitol Street

March 6, 2004

Cleveland Park Neighborhood Association Cleveland Park Library 3310 Connecticut Avenue, NW

March 8, 2004

Congress Heights Community Association Congress Heights United Methodist Church 421 Alabama Street, SE

March 13, 2004

Ward 5 Constituents Summit Trinity College 125 Michigan Avenue

March 16, 2004

Community Meeting Shiloh Baptist Church P & 9th Streets, NW

Future Scheduled Meetings

March 22, 2004

All Souls Church 1500 Harvard Street, NW Washington, DC 6:30 – 8:30 PM

March 23, 2004

Hine Junior High School 335 8th Street, SE Washington, DC 6:30 – 8:30 PM

March 24, 2004

George Washington University Jack Morton Auditorium 805 21st Street, NW Washington, DC 20052 7:00 – 9:00 PM

March 29, 2004

Pennsylvania Baptist Church 3000 Pennsylvania Avenue, SE Washington, DC 6:30 – 8:30 PM

March 31, 2004

Ketcham Elementary School 1919 15th Street, SE

Washington, DC 6:30 – 8:30 PM



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5000 OVERLOOK AVENUE, S.W. WASHINGTON, D.C. 20032

March 17, 2004

Ms. Karen D. Johnson, Chief Safe Drinking Water Act Branch (3WP32) Office of Compliance and Enforcement Water Protection Division U.S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103

SUBJECT: District of Columbia Water and Sewer Authority Lead Service Replacement Program for 2004

Dear Ms. Johnson:

In our annual report for the 2003 Lead Service Replacement Program, on page 3, the District of Columbia Water and Sewer Authority (DCWASA) presented its Lead Service Replacement Program for 2004.

As outlined in that plan, DCWASA intended to replace 615 lead services from addresses listed in Appendix H of the report via a combination of Capital projects, Contract 2004-1, and DCWASA Department of Water Services crews. DCWASA would also obtain, sample and test 1,000 lead service lines to demonstrate that they are below the lead action level. Further, DCWASA would provide monthly reports of the analytical results to lead service line samples collected in response to partial lead service line replacements; and DCWASA would provide an annual report for the 2004 lead service line replacement program.

This letter is an update to our Lead Service Replacement Program for 2004. In an effort to physically replace more service lines DCWASA has initiated and authorized an additional contract, Contract 2004-2. This contract will replace an additional 500 lead services based on a priority of individuals identified by the Department of Health to be at greatest risk to elevated lead levels. Additionally, we plan to replace approximately 1115 other lead services through a combination of ongoing DCWASA capital projects, projects being carried out by the District's Department of Transportation (DDOT), Contract 2004-1, and DCWASA Department of Water Services repair crews. This substantial acceleration of our replacement efforts for 2004 will require extensive coordination with homeowners, District agencies, and contractors.

In accordance with guidance developed by the DC Department of Health (DCDOH), DCW ASA is currently replacing service lines only between identified threaded joints to minimize water quality concerns associated with cutting and reconnection of lead service lines. In cases where the private property owner does not agree to the concurrent replacement of the privately -owned and maintained portion of the service line, this approach will often result in replacement of only the portion of the lead service line from the water main to the meter. DCWASA will continue this approach until agreement can be reached with DCDOH and USEPA concerning other approaches that can be taken to fully address water quality concerns. DCWASA hereby requests specific guidance from USEPA on the subject of use of partially replaced service lines to fulfill the 7 percent annual replacement requirement included in USEPA regulations.

DCWASA will continue to give residents and homeowners 45 days notice prior to replacement to provide notice to the resident that they may experience a temporary increase of lead levels. However, DCWASA requests that the 45 day notice be waived for lead services that may be replaced by DWS crews when

responding to emergency repairs or responding to other DCWASA crews or agencies that have discovered a lead service while excavating.

Should you have any questions concerning this amended plan for the Lead Service Replacement Program for 2004, please feel free to contact me or Curtis Cochrane at 202-787-2366.

Sincerely,

Original signed by Michael S. Marcotte

Michael S. Marcotte. P.E., DEE Deputy General Manager/Chief Engineer

DRAFT PLAN FOR WATER SAMPLING AND TESTING OF NON-LEAD SERVICE LINE CUSTOMERS

Background

In 2003, DCWASA carried out extensive testing of water sampled by customers listed in DCWASA's records as having lead water service lines in public space. Since that time, public focus on the lead in water issue has resulted in thousands more homes tested. Although all testing has been targeted to "lead" customers, DCWASA has provided test kits to non-lead customers, particularly if there are children under six or pregnant/nursing women in the household. The result is an extensive database of test results for the residential, single-family house sector representative of a variety of service pipe material – lead, copper, brass, unknown and other. While the residential water quality data is robust, data is lacking on the non-single family house sector served by non-lead pipes.

Objective

The DC Water and Sewer Authority (DCWASA) will carry out this plan to determine whether homes and other building not served by lead service lines may be experiencing excessive concentrations of lead in water. All sampling will follow protocols approved by the Environmental Protection Agency (EPA). Primary emphasis will be on buildings that are likely to serve children under the age of six.

Follow-up Investigation of Water Quality Data for Copper Customers

During the period of January 1, 2004, through March 8, 2004, DCWASA analyzed water samples from 1,752 residences. Of those, 699 were listed as non-lead in customer records as follows: copper, 556; brass, 105; and other, 38. A summary of the first draw and second draw test results is shown in Tables 1 and 2, respectively.

Table 1: 2004 First Draw Test Results by Service Line Material (through 3/8/04)

ppb	Lead	Copper	Brass	Unknown Ot	her
0-15	259	505	101	285	37
>15-50	320	42	3	128	0
>50-100	37	7	1	18	0
>100-150	4	0	0	1	1
>150-300	1	2	0	0	0
	621	556	105	432	38

Table 2: 2004 Second Draw Test Results by Service Line Material (through 3/9/04)

ppb	Lead	Copper	Brass	Unknown	Other
0-15	325	507	102	317	33
>15-50	172	34	1	66	2
>50-100	92	12	0	40	3
>100-150	20	3	2	7	0
>150-300	12	0	0	2	0
	621	556	105	432	38

DCWASA wishes to conduct an investigation of homes listed with non-lead (copper, brass and other) service lines with test results above the USEPA lead action level of 15 ppb on the second draw. This represents a total of 57 addresses. The purpose of this testing is to verify if the service line is non-lead from the water main into the house. DCWASA will conduct three test pits at each of 11 (20%) addresses to confirm the service line material. Nine copper addresses, one brass, and one other address will be selected. The test pits will be excavated to the depth of the service line as follows: on the water main side of the meter; in public space, on the house side of the meter; on private property (pending permission of the homeowner).

Given that 699 non-lead, single-family residences are represented in the data presented above, no further sampling and testing of homes in this category will be conducted.

Sampling Pool for Non-Lead, Non-Single-Family Residential

Lead service lines in DCWASA's distribution system are limited to 2-inch diameter pipes and smaller. DCWASA will perform a search of records for customers with service lines 3 inches in diameter and greater to establish the following sampling pool:

Table 3: Non-Lead Service Line Facilities To Be Tested

# Facilities	Facility Type
108	Public schools**
40*	Charter and independent
	schools**
12*	Other unaffiliated schools
8	Daycare centers**
4	Public libraries**
4	DC government buildings.
4	Recreation centers**
4	Hospitals/clinics
8	Apartment buildings w/ 3" to
	4" service lines
8	Apartments w/ 6" and larger
	service lines
200	Total

^{*} DCWASA has extended the offer to sample and test the water of all charter schools and Association of Independent Schools in DC. Estimate is that 40 of approximately 70 schools in these categories will participate and that another 12 unaffiliated schools (as identified by the Mayor's office) will participate.

Facilities will be selected to be representative of all four quadrants of the District of Columbia: NE, SE, NW, and SW. Four of the apartment buildings will be public housing. Buildings will be selected with a variety of construction dates that pre-date 1986 at which time the use of lead solder was banned.

Testing Protocols

^{**} List of all facilities in category already provided to DCWASA.

All testing will follow the protocol for school sampling (Attachment 1) with the exception of apartment buildings. The school sampling protocol was developed with the assistance of Ms. Lisa Donahue, Acting Chief of USEPA SDWA Enforcement Branch, and is based on the USEPA protocol as modified to restrict flushing (the evening before the testing) to just those fixtures that will be tested. The protocol for apartment flushing (Attachment 2) is also attached.

School Sampling and Testing

On February 14 and 15, 2004, DCWASA conducted sampling at five outlets (generally three water fountains and two sinks, as available) in each of 154 public school buildings in the District. One, 1-liter samples were taken following a ten-minute flush at every fixture tested. One first draw sample was taken at approximately one out of every five schools.

DCWASA will do further testing of public schools based on the new protocol in Attachment 1. The focus of the testing will be on fixtures at which the high-risk population of children under six years of age is likely to drink on a regular basis. Accordingly, DC Public Schools (DCPS) has identified 108 public schools with pre-kindergarten, kindergarten, and Head Start programs. DCPS is also working to identify schools with programs targeted at pregnant students. If additional schools are identified in this category, they will be added to the sampling and testing program.

Public school sampling and testing will be conducted as follows:

- DCPS will provide an inventory of all fixtures to be tested in each school from which the high-risk population would drink on a regular basis;
- DCWASA will provide all materials for sampling;
- DCPS will identify facility engineers to conduct the sampling at the schools;
- DCWASA will provide training and supplies to the DCPS facility engineers;
- Facility engineers will deliver samples to the Penn Center, a central collection site;
- DCWASA will pick up and deliver samples to an independent laboratory for analysis;
- DCWASA will provide a report of findings to DCDOH and DCPS.

DCWASA will accomplish sampling for charter and independent schools that express an interest in participating in this testing program and that serve the high-risk population of children under six years of age on a regular basis. DCWASA developed an initial memo (3/1/04, Attachments 3 and 4) and survey (Attachments 5 and 6) for interested schools that was distributed via the charter school boards and the Association of Independent Schools of Greater Washington. DCWASA sampling was scheduled to take place on March 13 and 14, 2004. This sampling was postponed pending the approval of the new school testing protocol. A follow-up memo (3/11/04, Attachments 7 and 8) and supplemental survey (Attachments 9 and 10) were distributed accordingly.

Charter and independent school testing will be conducted as follows:

- Interested schools must submit the completed surveys by March 22, 2004;
- Schools must perform flushing of fixtures to be tested the evening before the sampling and ensure that there is no water use a minimum of eight hours prior to the sampling;
- Schools must also provide entry to the building, escort to the fixtures to be tested, and building lock up.
- DCWASA will provide all supplies and staff to do the sampling, to be scheduled for a Saturday;
- DCWASA will deliver the samples to an independent laboratory for analysis;
- DCWASA will provide a report of findings to each participating school.

DCWASA has been in contact with the Mayor's office for a list of schools that may fall outside of the charter boards and independent school association described above. Once these schools are identified, DCWASA will extend the same sampling and testing services as for the charter and independent schools.

All Other Sampling and Testing

Sampling and testing in all other categories will be as follows:

 DCWASA will call facility managers and invite them to participate in this program until the desired number of facilities of each type agrees to participate;

- Each facility will designate a person who will be responsible for the sampling;
- Facility representatives will be required to provide DCWASA with a count of fixtures to be tested (or for apartments, units to be tested);
- DCWASA will conduct at least two training sessions on different days at different geographic locations in the District for the facility representatives responsible for sampling;
- DCWASA will give out all needed supplies during the training sessions;
- Facility representatives will conduct sampling and deliver samples to specified drop-off locations;
- DCWASA will deliver all samples to an independent laboratory for analysis;
- DCWASA will send a report of test results to each facility.

Apartments will be sampled as follows: one apartment for every 10 units up to a maximum of 10 apartments per building complex evenly distributed throughout.

Schedule

All school sampling and analysis, for public, charter, and independent schools will be completed and the results reported within six weeks of EPA's approval of this plan.

For all other sampling and testing, an estimated schedule is as follows:

Table 4: Schedule for Plan Implementation

Task	# Weeks from EPA
Phone calls made and surveys mailed to potential participants	Approval of Plan 1
Responses received (inventory of fixtures/apartment units to be tested and name of responsible person)	3
DCWASA performs training and hands out sampling kits	5
Facilities perform sampling and deliver kits to DCWASA	8
Results reported to facilities	12

DCWASA will submit a comprehensive report of findings of this non-lead service line sampling and testing plan to the Mayor's office, EPA and DOH three months from the date of EPA's approval of this plan.

DRAFT Apartment Building Sampling Plan

Introduction

The results of the District of Columbia Water and Sewer Authority (DCWASA) lead sampling and testing program indicates that the DCWASA system continues to exceed the lead Action Level (July 2001 – December 2003). This requires DCWASA to replace at least 7% of the lead service lines per year and continue with Public Notification as long as the system exceeds the lead Action Level.

Per the EPA letter dated March 4, 2004, DCWASA has developed this supplemental water-sampling plan for apartment buildings.

Objective

The objective is to sample and test for lead in the drinking water at sixteen apartment buildings focusing on outlets that serve the high-risk population (pregnant/nursing women and children under the age of six). Sixteen apartment buildings constructed prior to 1986 will be randomly selected from CIS with an even distribution by quadrant (eight with three to four inch diameter service connections and eight with a service connection greater than four inches). Also, 25% of the apartment buildings should be public housing.

Agency Roles and Responsibilities

- The testing procedures will be coordinated with the EPA, DOH and DCWASA.
- DCWASA will conduct training applicable apartment building representatives that will conduct the sampling.
- DCWASA will provide all materials to conduct the sampling.
- Apartment building representatives will complete all sampling within three weeks of the training and deliver all samples to DCWASA.
- DCWASA will have the samples tested by an outside laboratory.
- DCWASA will provide a report of results to EPA, DOH and the apartment building representatives within three weeks of the final drop-off date.

Work Plan

Apartment building representatives (trained by DCWASA) will obtain two water samples from one outlet in every ten occupied units (a maximum of ten samples per apartment building complex) focusing on outlets that serve the high-risk population (pregnant/nursing women and children under the age of six). Results of the testing will be shared with the EPA, DOH and the apartment building representatives. See Appendix A for sampling procedures.

Appendix A

Apartment Building Sampling Procedures

Once training is completed by DCWASA, apartment building representatives will obtain two water samples from each of the identified outlets. As a preamble to the flushing and sampling procedures, please note the following:

- It's very important that sampling be performed at least 8 hours, but no more than 18 hours, after the outlet is used.
- Sample from the bottom floor of the building to the top floor. (Reverse if gravity fed.)

Sampling

- Document the apartment number and outlet sample location description on chain of custody.
- 2. Mark the sample ID on the sample bottles.
- 3. Remove aerator/screen from outlet, if applicable.
- 4. Slowly open the coldwater valve and collect a one liter 1st Draw sample.
- 5. Flush for exactly 10 minutes.
- 6. Collect a one liter 2nd Draw sample.
- 7. Shut-off the water.
- 8. Reinstall the aerator/screen, if applicable.
- 9. Complete the chain of custody.

Guidelines for Sample bottle labeling

 Each bottle should be labeled with the date, time, sample collector's name, Sample Number, Address and Apartment Number.

DRAFT Plan for Sampling in Schools

Introduction

In 1988, the Lead Contamination Control Act required schools to test their water for lead and to remedy problems found. During the 1993-1994 school year, system-wide testing was performed in District of Columbia public schools to determine if there were elevated levels of lead in water fountains. As a result of the study, 300 water fountains with lead fixtures were replaced. Those not replaced were taken out of service.

The results of the District of Columbia Water and Sewer Authority (DCWASA) lead sampling and testing program indicates that the DCWASA system continues to exceed the lead Action Level (July 2001 – December 2003). This requires DCWASA to replace at least 7% of the lead service lines per year and continue with Public Notification as long as the system exceeds the lead Action Level.

Due to public concern related to the recent lead sampling and testing results, from February 14th through February 19th, 2004, DCWASA sampled and tested for lead in the drinking water supplied to District of Columbia Public Schools (DCPS). Every occupied public school in the District was tested as well as administrative and shop facilities. Five water outlets, three fountains and two sinks, were sampled in each school. The results show that the vast majority of DCPS facilities have extremely low levels of lead in the water provided by the DCWASA water distribution system.

Out of 752 samples taken, all but eight contained either no detectable quantities of lead or levels below the Environmental Protection Agency (EPA) lead Action Level (established for residences) of 15 parts per billion (ppb). Additional testing is now desired of all drinking water sources in public schools to which the highest risk population, i.e., pregnant students and children under six in Head Start, Pre-K, and Kindergarten, may be chronically exposed. Every DCPS, including junior and high schools, serve this population on a daily basis. Bathroom sinks will not be tested, unless the sink is the only source of water for the target population.

Accordingly, DCWASA, DCPS, DC Department of Health (DOH) and EPA Region III have developed this supplemental water-sampling plan. In addition, at a later date, follow-up testing will be conducted at the eight fixtures, which previously tested above the EPA lead action level of 15 ppb. The following is an update on remediation actions from the eight locations:

Ballou, Bell, and Eliot: Sink faucets have been replaced.

Dunbar: Filter was installed on drinking fountain.

Prospect @ Douglas: Drinking fountain was removed.

Woodson: Sink and faucets were replaced.

<u>Kenilworth:</u> Sink faucets were replaced (knobs have been temporally removed because shut-off valves are not holding).

Penn: Drinking fountain will be replaced (pending completion of school lead issues).

Objective

The objective is to sample and test for lead in the drinking water at each of the DCPS focusing on drinking water fountains and sinks serving the high-risk population (pregnant students and children under the age of six).

Agency Roles and Responsibilities

- The testing procedures will be coordinated with the four agencies involved.
- Prior to sampling, DCPS should provide the following to DCWASA using the attached sheet entitled "Inventory of Water Outlets In Schools for Children Under 6 Years Old", as a guideline:
 - o an inventory of outlets (number outlets from left to right) in each school focusing on drinking water fountains and sinks serving the high risk population (pregnant students and children under the age of six) with a breakdown into the following five outlet

types: 1) water coolers, 2) bubblers, 3) classroom sinks, 4) kitchen sinks and 5) other sinks (bathroom or other sinks used as a drinking water source, i.e. drinking cups placed next to the sink). Also, include all outlets that are not currently in operation and note them as such on the inventory. (Note that when the outlets are placed back in service, these outlets should be tested);

- a list of schools that are gravity fed (if applicable);
- o a list of schools having central chillers feeding multiple bubblers (if applicable);
- o a list of schools having electrical service grounded to water pipes; and
- a list of any filters, either whole-school, on particular lines, or on specific fixtures (including any information on model number, when last changed, installation dates, etc.).
- DCPS will provide staff to conduct the flushing and sampling at the schools.
- DCWASA will conduct training at the Penn Center of all DCPS staff assigned to conduct the flushing and sampling.
- DCWASA will provide all materials to conduct the sampling.
- DCPS will complete all sampling within one week of the training.
- DCPS will deliver all samples to the Penn Center for pickup by DCWASA.
- DCWASA will have the samples tested by an outside laboratory.
- DCWASA will provide a report of results to DCPS and DOH within three weeks of the final pick-up date.
- DCPS/DOH will provide any remediation recommendations, based upon applicable results.

Work Plan

DCPS personnel (trained by DCWASA) will obtain two water samples from each drinking water fountain and sink serving the high-risk population (children under the age of six) in DCPS. The drinking water fountains and sinks serving the high-risk population (children under the age of six) in the DCPS will be identified by DCPS. Results of the testing will be shared with the Superintendent of DCPS. See Appendix A for sampling procedures.

School Name:
Address:
Zip Code:
Contact Name:
Telephone Number:

Inventory of Drinking Water Outlets In Schools for Children Under 6 Yea

Outlet Types: Water Cooler, Bubbler, Classroom Sink, Kitchen Sink or Other Sink.

Number	Outlet Type	Outlet Location Description	Filter (Yes or No)	In (Yes
1				
2				
3				
4				
5				
6				
7				
8				
9				,
10				,
11				,
12				
13				,
14				,
15				
16				,
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Appendix A

Sampling Procedures

Once training is completed by DCWASA, DCPS Facilities Management Division Service Section personnel will flush and obtain two water samples from each of the identified outlets in DCPS. As a preamble to the flushing and sampling procedures, please note the following:

- It's very important that all flushing be performed at least 8 hours, but no more than 18 hours, prior to sampling.
- Flush from the top floor of the building to the bottom floor. (Reverse if gravity fed.)
- Sample from the bottom floor of the building to the top floor. (Reverse if gravity fed.)
- When encountering multiple feeds off of one header (i.e. four water fountains off of one service line), only one (1) second draw is required.

Non Water Cooler Flushing

- 1. Document outlet sample location description and draw a sketch on chain of custody.
- 2. Mark sample location with ID label and confirm outlet type.
- 3. Remove aerator/screen from outlet, if applicable.
- 4. Fully open the coldwater valve.
- 5. Flush for 10 minutes (minimum).
- 6. Shut-off the water.
- 7. Hang "Testing Location Do Not Use" Notice
- 8. Document flushing on the chain of custody.

Non Water Cooler Sampling

- 1. Confirm sample outlet type, outlet location and bottle label on chain of custody.
- 2. Slowly open the coldwater valve and collect a 250 ml 1st Draw sample.
- 3. Flush for exactly 30 seconds.
- 4. Collect a 250 ml 2nd Draw sample.
- 5. Shut-off the water.
- 6. Reinstall the aerator/screen, if applicable.
- 7. Complete the chain of custody.

Water Cooler Flushing

- 1. Document water cooler sample location and draw a sketch on chain of custody.
- 2. Mark sample location with ID label and confirm outlet type.
- 3. Remove aerator/screen from water cooler, if applicable.
- 4. Fully open the coldwater valve.
- 5. Flush for 15 minutes (minimum).
- 6. Shut-off the water.
- Hang "Testing Location Do Not Use" Notice
- 8. Document flushing on the chain of custody.

Water Cooler Sampling

- 1. Confirm water cooler sample location and bottle label on chain of custody.
- 2. Slowly open the coldwater valve and collect a 250 ml 1st Draw sample.
- 3. Flush for exactly 15 minutes.
- 4. Collect a 250 ml 2nd Draw sample.
- 5. Shut-off the water.
- 6. Reinstall the aerator/screen, if applicable.
- 7. Complete the chain of custody.

Guidelines for Sample bottle labeling

- Use the attached sheet entitled "Inventory of Water Outlets In Schools for Children Under 6 Years Old", to track each sample.
- Each bottle should be labeled with the date, time, and sample collector's name (the Sample Number and Address will be completed during training).
- The following labeling system will be utilized:

School Name – School Classification –Outlet # - Outlet Type - Sample # (see examples below):

- Barnard Elementary School Outlet #6 Water Cooler
 - The labels for the two samples should be:

BARNARD-ES-06-WC-1 BARNARD-ES-06-WC-2

- o Clark Elementary School Outlet #10 Bubbler
 - The labels for the two samples should be:

CLARK-ES-10-B-1 CLARK-ES-10-B-2

- o Shaw Junior High School Outlet #15 Classroom Sink
 - The labels for the two samples should be:

SHAW-JHS-15-CS-1 SHAW-JHS-15-CS-1

- o Ballou Senior High School Outlet #1 Kitchen Sink
 - The labels for the two samples should be:

BALLOU-SHS-01-KS-1 BALLOU-SHS-01-KS-2

- o Hine Junior High School Outlet #12 Other Sink
 - The labels for the two samples should be:

HINE-JHS-12-OS-1 HINE-JHS-12-OS-2 TO: CHARTER SCHOOLS OF THE DC PUBLIC CHARTER SCHOOL BOARD AND

THE DC BOARD OF EDUCATION

FROM: JERRY N. JOHNSON, GENERAL MANAGER

DATE: MARCH 1, 2004

SUBJECT: DCWASA TO PERFORM TESTING OF CHARTER SCHOOLS

In light of the health implications of the exposure of children to lead, the DC Water and Sewer Authority (DCWASA) is offering to conduct water sampling at every charter school building in the District of Columbia. The sampling will be conducted over the weekend of March 13th and 14th, 2004. DCWASA will sample up to five representative locations in each school as available in this order of preference: three water fountains and two sinks (kitchen, health room, classroom sink used for drinking, home economics room, teacher's lounge, or other).

DCWASA will send a crew to each school to perform the sampling. Please allow approximately one hour for the sampling at your school. Following the sampling, DCWASA will send the samples to an independent laboratory for analysis. A report of our findings will be sent to you within two weeks.

In order for DCWASA to conduct the sampling, the following will be required of each school:

- 1. Complete the attached survey to help us in properly planning for the testing at your school.
- 2. Ensure that no water is used in the building for a minimum of six hours prior to the sampling.
- 3. Provide entry to the building at the scheduled sampling time, an escort within the building who can direct the DCWASA crew to the fountains and/or sinks to be tested, and lock up of the building following the work. We will need the name and contact information of the person who will serve in this role.

As we work toward the solution to this problem, we advise you to adhere to the following precautions:

- > The DC Department of Health (DCDOH) advises pregnant and nursing women and children under six in homes served by lead pipes NOT to drink water from the tap without filtering it first using a home filtration device that is certified for the removal of lead. Attacheded is a fact sheet containing general information on home filtration devices that are commonly available. In homes that have test results showing lead levels above 15 ppb, or in homes believed to have lead service lines, baby formula or concentrated juices should not be mixed with the tap water from these homes unless the water is filtered.
- ➤ DCDOH provides information on how to have children and pregnant women screened for blood lead levels. DCDOH can be reached by calling (202) 535-2690 or by visiting its web site www.dchealth.dc.gov. If parents or guardians have additional concerns about a child's health, they should contact his or her pediatrician.
- ➤ Use cold water for drinking or cooking, as hot water could contain higher levels of lead. Cold water should be heated on the stove for hot beverages or cooking. Boiling water does not remove lead.
- > Draw water for drinking or cooking purposes immediately after another high water use activity, such as bathing or washing your clothes, so that a total of at least 10 minutes of flushing has occurred. (The large amount of water used will flush significant amounts of water from your home's pipes.) Since these types of activities are not often performed in schools, you should consider flushing each fountain or sink from which children are drinking water for ten minutes before the start of each school day.
- In addition, when using a fountain or sink that has not been in use for six hours or more, run the tap for another 60 seconds before use. It is highly recommended at this time to collect water in

several clean containers and place them in the refrigerator for daily drinking and cooking purposes.

- Periodically, remove and clean the strainer/aerator device on your faucet to remove debris.
- ➤ If you are flushing your water lines but still have concerns about lead, you may want to consider switching to bottled water or using a treatment device. Be sure to use a treatment device certified by an independent testing organization, such as NSF International. Neither EPA nor DCWASA certifies or endorses home drinking water treatment devices. You can search the NSF International website for certified drinking water treatment units by visiting:

www.nsf.org/Certified/DWTU

Choose a treatment device (i.e. filtration pitchers or tap filters) that will be used after potentially lead-leaching plumbing components. These devices must be installed, operated and maintained according to manufacturer instructions.

In order to have DCWASA perform the sampling and testing of the drinking water within your school, we will need you to respond to this notice by TUESDAY, MARCH 9th, 2004. After this date, we will be able to supply you with test kits, but we will no longer be able to perform the sampling for you. Please complete the attached survey and send it to: Mr. Curtis Cochrane, by email at cochrane@dcwasa.com or by fax, 202-787-2453. If you have questions, please call Mr. Cochrane at 202-787-2366.

We look forward to your response.

TO: CHARTER SCHOOLS OF THE DC PUBLIC CHARTER SCHOOL BOARD AND

THE DC BOARD OF EDUCATION

FROM: JERRY N. JOHNSON. GENERAL MANAGER

DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY (DCWASA)

DATE: MARCH 11, 2004

SUBJECT: IMPORTANT UPDATE REGARDING THE TESTING OF WATER IN

DC CHARTER SCHOOLS

This is to notify all DC Charter Schools that the DCWASA water sampling that was planned for this coming weekend will be postponed until further notice. We are still aiming to have the sampling results in your hands by the end of April. This extra time is needed to ensure that all sampling and testing will satisfy Environmental Protection Agency (EPA) requirements. Accordingly, DCWASA has been working closely with EPA representatives to develop sampling procedures that will produce meaningful data on drinking water quality in the schools.

The new procedures require that DCWASA obtain additional information from your school prior to conducting the sampling. Please complete the attached survey and return it to DCWASA by Monday, March 22, 2004. After this date, we will be able to supply you with test kits, but we will no longer be able to perform the sampling for you. Please complete the attached survey and send it to: Mr. Curtis Cochrane, by email at cochrane@dcwasa.com or by fax at 202-787-2453. If you have questions, please call Mr. Cochrane at 202-787-2366.

If you have not yet requested the testing of your school, you may do so by completing the initial survey and the supplemental survey at this time.

We appreciate your patience as we work to ensure that the sampling and testing of the water in your school produces the most meaningful results.

DC CHARTER SCHOOL SURVEY FOR DCWASA'S WATER SAMPLING AND TESTING PROGRAM FOR LEAD

DCWASA'S WATER SAMPLING AND TESTING PROGRAM FOR LEAD

Please complete the following:

School name:

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Age of building if known:

2.	Property address:
3.	Mailing address if different:
4.	Director's/Principal's name:
5.	School phone number:
6. sar	Name of person responsible for entry, escort around school, and lock up on the day of the water mpling:
7.	Is the person named in #6 on the premises on the weekend?
8.	If "yes" to #7, days and times on premises:
9.	List all possible phone numbers for contacting person named in #6:
	At school:Home:Cell:
10.	Name of emergency contact:
11.	Phone number(s) where emergency contact is certain to be reached:
12.	Number of students enrolled in school:
13.	Grades of students:
14.	How long has you school been at this location?
15.	Does your school own the building?
16.	If no to #15, provide the following:
	Name of owner:
	Address of owner: Owner phone number:
17.	List known improvements made to the school's plumbing and fixtures with dates:

Size and material of water service line, if known (e.g., 6-inch cast iron):

20.		History of building use prior to school use, if known:
21.		Does your school have water fountains or water coolers?
22.		If yes to #21, ages of fountains/coolers if known:
23.		A maximum of five drinking water outlets will be sampled in each school. Those that are most frequently used for drinking are recommended. We recommend three fountains, if available, and two sinks. List the specific water outlets that you would like DCWASA to sample. Be specific in your descriptions of the outlets and their locations. Examples: 1 st floor fountain immediately outside of room 3; cafeteria sink facing into room.
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24.		Does your school have the following uses:
	>	Food preparation/cafeteria:
	>	Health room with sink or fountain:
	>	Classrooms with sinks or fountains:
	>	Home economics room
	>	Teacher's lounge with sink or fountain
	>	Any other uses with sinks or fountains used for drinking
25.		List number of fountains and/or sinks used in your school for drinking:
	>	Number of sinks:
	>	Number of fountains:
26.		Number of floors in building above basement level:
27.		List floors that school occupies:
28.		Is there is a basement that is used for food preparation or student activities?
29.		Is the building shared with any other school or business?
30.		If yes, to #29, specify names of other school(s) or business(es):
31.		Square footage of space occupied by school:

- 32. Is the building used on weekends:
- 33. If yes to #32, list all activities for the weekend of March 13th and 14th, including a description of the activity and scheduled time of activity:
- 34. Has the water in you school ever been tested?
- 35. If yes to #34, provide as much information as you can on the testing methodology and test results.

SUPPLEMENT

DC CHARTER SCHOOL SURVEY

FOR

DCWASA'S WATER SAMPLING AND TESTING PROGRAM FOR LEAD

Please complete the following:

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TO: ASSOCIATION OF INDEPENDENT SCHOOLS OF GREATER WASHINGTON

(AISGW)

FROM: JERRY N. JOHNSON, GENERAL MANAGER

DATE: MARCH 1, 2004

SUBJECT: DCWASA TO PERFORM TESTING OF INDEPENDENT SCHOOLS

In light of the health implications of the exposure of children to lead, the DC Water and Sewer Authority (DCWASA) is offering to conduct water sampling at every independent school building in the District of Columbia. The sampling will be conducted over the weekend of March 13th and 14th, 2004. DCWASA will sample up to five representative locations in each school as available in this order of preference: three water fountains and two sinks (kitchen, health room, classroom sink used for drinking, home economics room, teacher's lounge, or other).

DCWASA will send a crew to each school to perform the sampling. Please allow approximately one hour for the sampling at your school. Following the sampling, DCWASA will send the samples to an independent laboratory for analysis. A report of our findings will be sent to you within two weeks.

In order for DCWASA to conduct the sampling, the following will be required of each school:

- 4. Complete the attached survey to help us in properly planning for the testing at your school.
- 5. Ensure that no water is used in the building for a minimum of six hours prior to the sampling.
- 6. Provide entry to the building at the scheduled sampling time, an escort within the building who can direct the DCWASA crew to the fountains and/or sinks to be tested, and lock up of the building following the work. We will need the name and contact information of the person who will serve in this role.

As we work toward the solution to this problem, we advise you to adhere to the following precautions:

- > The DC Department of Health (DCDOH) advises pregnant and nursing women and children under six in homes served by lead pipes NOT to drink water from the tap without filtering it first using a home filtration device that is certified for the removal of lead. Attached is a fact sheet containing general information on home filtration devices that are commonly available. In homes that have test results showing lead levels above 15 ppb, or in homes believed to have lead service lines, baby formula or concentrated juices should not be mixed with the tap water from these homes unless the water is filtered.
- ➤ DCDOH provides information on how to have children and pregnant women screened for blood lead levels. DCDOH can be reached by calling (202) 535-2690 or by visiting its web site www.dchealth.dc.gov. If parents or guardians have additional concerns about a child's health, they should contact his or her pediatrician.
- > Use cold water for drinking or cooking, as hot water could contain higher levels of lead. Cold water should be heated on the stove for hot beverages or cooking. Boiling water does not remove lead.
- > Draw water for drinking or cooking purposes immediately after another high water use activity, such as bathing or washing your clothes, so that a total of at least 10 minutes of flushing has occurred. (The large amount of water used will flush significant amounts of water from your home's pipes.) Since these types of activities are not often performed in schools, you should consider flushing each fountain or sink from which children are drinking water for ten minutes before the start of each school day.
- In addition, when using a fountain or sink that has not been in use for six hours or more, run the tap for another 60 seconds before use. It is highly recommended at this time to collect water in

several clean containers and place them in the refrigerator for daily drinking and cooking purposes.

- > Periodically, remove and clean the strainer/aerator device on your faucet to remove debris.
- ➤ If you are flushing your water lines but still have concerns about lead, you may want to consider switching to bottled water or using a treatment device. Be sure to use a treatment device certified by an independent testing organization, such as NSF International. Neither EPA nor DCWASA certifies or endorses home drinking water treatment devices. You can search the NSF International website for certified drinking water treatment units by visiting:

www.nsf.org/Certified/DWTU

Choose a treatment device (i.e. filtration pitchers or tap filters) that will be used after potentially lead-leaching plumbing components. These devices must be installed, operated and maintained according to manufacturer instructions.

In order to have DCWASA perform the sampling and testing of the drinking water within your school, we will need you to respond to this notice by MONDAY, MARCH 9th, 2004. After this date, we will be able to supply you with test kits, but we will no longer be able to perform the sampling for you. Please complete the attached survey and send it to: Mr. Curtis Cochrane, by email at cochrane@dcwasa.com or by fax, 202-787-2453. If you have questions, please call Mr. Cochrane at 202-787-2366.

We look forward to your response.

TO: ASSOCIATION OF INDEPENDENT SCHOOLS OF GREATER WASHINGTON

(AISGW)

FROM: JERRY N. JOHNSON, GENERAL MANAGER

DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY (DCWASA)

DATE: MARCH 11, 2004

SUBJECT: IMPORTANT UPDATE REGARDING THE TESTING OF WATER IN

INDEPENDENT SCHOOLS

This is to notify all Association of Independent Schools that the DCWASA water sampling that was planned for this coming weekend will be postponed until further notice. We are still aiming to have the sampling results in your hands by the end of April. This extra time is needed to ensure that all sampling and testing will satisfy Environmental Protection Agency (EPA) requirements. Accordingly, DCWASA has been working closely with EPA representatives to develop sampling procedures that will produce meaningful data on drinking water quality in the schools.

The new procedures require that DCWASA obtain additional information from your school prior to conducting the sampling. Please complete the attached survey and return it to DCWASA by Monday, March 22, 2004. After this date, we will be able to supply you with test kits, but we will no longer be able to perform the sampling for you. Please complete the attached survey and send it to: Mr. Curtis Cochrane, by email at cochrane@dcwasa.com or by fax at 202-787-2453. If you have questions, please call Mr. Cochrane at 202-787-2366.

If you have not yet requested the testing of your school, you may do so by completing the initial survey and the supplemental survey at this time.

We appreciate your patience as we work to ensure that the sampling and testing of the water in your school produces the most meaningful results.

INDEPENDENT SCHOOLS OF GREATER WASHINGTON SURVEY FOR DCWASA'S WATER SAMPLING AND TESTING PROGRAM FOR LEAD

DCWASA'S WATER SAMPLING AND TESTING PROGRAM FOR LEAD Please complete the following: 45. School name: 46. Property address: 47. Mailing address if different: 48. Director's/Principal's name: 49. School phone number: 50. Name of person responsible for entry, escort around school, and lock up on the day of the water sampling: 51. Is the person named in #6 on the premises on the weekend? 52. If "yes" to #7, days and times on premises: 53. List all possible phone numbers for contacting person named in #6: At school: Home: Cell: 54. Name of emergency contact: 55. Phone number(s) where emergency contact is certain to be reached: 56. Number of students enrolled in school: 57. Grades of students:

List known improvements made to the school's plumbing and fixtures with dates:

Size and material of water service line, if known (e.g., 6-inch cast iron):

How long has you school been at this location?

Does your school own the building?

If no to #15, provide the following:

Name of owner:

Address of owner: Owner phone number:

Age of building if known:

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64.		History of building use prior to school use, if known:
65.		Does your school have water fountains or water coolers?
66.		If yes to #21, ages of fountains/coolers if known:
67.		A maximum of five drinking water outlets will be sampled in each school. Those that are most frequently used for drinking are recommended. We recommend three fountains, if available, and two sinks. List the specific water outlets that you would like DCWASA to sample. Be specific in your descriptions of the outlets and their locations. Examples: 1 st floor fountain immediately outside of room 3; cafeteria sink facing into room.
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68.		Does your school have the following uses:
	>	Food preparation/cafeteria:
	>	Health room with sink or fountain:
	>	Classrooms with sinks or fountains:
	>	Home economics room
	>	Teacher's lounge with sink or fountain
	>	Any other uses with sinks or fountains used for drinking
69.		List number of fountains and/or sinks used in your school for drinking:
		> Number of sinks:
		> Number of fountains:
70.		Number of floors in building above basement level:
71.		List floors that school occupies:
72.		Is there is a basement that is used for food preparation or student activities?
73.		Is the building shared with any other school or business?
74.		If yes, to #29, specify names of other school(s) or business(es):

Square footage of space occupied by school:

75.

- 76. Is the building used on weekends:
- 77. If yes to #32, list all activities for the weekend of March 13th and 14th, including a description of the activity and scheduled time of activity:
- 78. Has the water in you school ever been tested?
- 79. If yes to #34, provide as much information as you can on the testing methodology and test results.

SUPPLEMENT

INDEPENDENT SCHOOL SURVEY

FOR

DCWASA'S WATER SAMPLING AND TESTING PROGRAM FOR LEAD

Please complete the following:

80.	School name:
81.	Property address:
82.	Does your school have half-day or full-day programs for children under the age of 6?
83.	If "no" to #3, skip the remaining questions, provide your name, title and date at the bottom of this form.
84.	If "yes" to #3, provide the number of water outlets (by type listed) in the school that would serve as drinking water sources for children under the age of six. Do not list water outlets that are only used by children six and older. Include outlets that are not presently in use.
Wa	ter Outlet Type # in School
	Bubbler
	Water cooler
	Classroom faucets
	Kitchen faucets
	Other faucets (health room, gym, etc.)
85.	Complete the attached inventory of all school water outlets counted in #4.
86.	Does your school have a gravity-fed water source?
87.	Does your school have a central chiller that feeds multiple bubblers?
88.	Does your school have a whole-school water filtration system or a water filtration system on certain plumbing pipes? If so, provide details on the type and location of filter.
 Prir	nt Name & Title Date